

REMARKS

Claims 1-38 are pending in the application and stand rejected. By the above amendment, claim 23 has been amended and claim 26 has been canceled without prejudice. Claim 23 was amended to include the subject matter recited in claim 26, thus no new issues have been raised which would require a further search or consideration. Accordingly, reconsideration of the claim rejections in view of the above amendments and the following remarks is respectfully requested.

Claim Rejections- 35 U.S.C. § 103(a)

Claims 1-38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,501,832 to Saylor et al. in view of U.S. Patent No. 6,438,217 to Huna and further in view of U.S. Patent No. 6,430,624 to Jamtgaard et al. In addition, claim 1 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Jamtgaard.

It is respectfully submitted that at the very minimum, the combination of Saylor, Huna and Jamtgaard is legally deficient to establish a prima facie case of obviousness against independent claims 1, 23 and 34. Further, claim 1 is not rendered obvious by the teachings of Jamtgaard. To establish a *prima facie* case of obviousness based on a combination of references, the combination of references must, *inter alia*, teach or suggest all the claim limitations.

Here, it is respectfully submitted that the combination of Saylor, Huna, and Jamtgaard fails to establish a *prima facie* case of obviousness against claims 1, 23 and 34 because such combination does not disclose or suggest a conversation portal , much less a conversational portal *having the capability to retrieve pages from an information source in response to a request from a requesting client and serve or present the retrieved pages to the requesting client*

in a format that is compatible with the I/O modalities of the requesting client by converting the retrieved page, if necessary, as essentially claimed in claims 1, 23 and 34.

Indeed, although Saylor arguably discloses a “portal”, Saylor discloses a Voice Portal system, which is a mono-modal system (not a multi-modal system) that is capable of interacting with a user only via an audio interface (speech, DTMF). Indeed, it is abundantly clear from the teachings of Saylor that the disclosed Voice Portal system (i) is accessible by a user via voice or DTMF via “telephony devices”, (ii) only performs mono-modal dialog via a “voice browser” and (iii) only provides “voice content” by serving or processing only pre-constructed Vpages (voice modality).

Based on the clear teachings of Saylor, it is respectfully Examiner’s contention (on page 1 of the Final Office Action) that Saylor discloses an interface (conversational browser) for conducting information exchange (i.e., multi-modal dialog) with clients having varying I/O modalities, is misplaced, and clearly not supported by the express teachings of Saylor. Indeed, it is clear to one of ordinary skill in the art that the mono-modal, voice-based, system of Saylor does not disclose or *remotely* suggest a conversational portal that is capable of *converting the retrieved page, if necessary, in a format that is compatible with the I/O modalities of the requesting client.*

Furthermore, neither Huna nor Jamtgaard cures the deficiencies of Saylor in this regard. Indeed, Huna is merely directed to a messaging system that is capable of converting messages (e-mail, voice, fax) to formats that are compatible with recipient devices, and there is nothing even remotely related to a “portal” as is understood by those of ordinary skill in the art. For instance, a text message (e.g., e-mail) can be converted to a voice message (via TTS) for a voice-only

receiving device (See, e.g., Col. 15, lines 24-37). The process of converting simple text messages is very different from the process of converting structured content pages. Indeed, simple messages typically have content, but no structure, whereas content pages (e.g., HTML, VoiceXML, WML, etc.) have both content and structure. Accordingly, content pages are much harder to convert to different formats. Accordingly, the teachings of Huna with respect to messaging systems is unrelated to the claimed inventions of conversational portals that *converting the retrieved page, if necessary, in a format that is compatible with the I/O modalities of the requesting client.*

Furthermore, although Jamtgaard arguably discloses a system for converting content pages from one format to another, Jamtgaard does not disclose or suggest a “portal” system, much less a conversational portal for retrieving pages from the content server in response to a request communicated from the access device and one of serving and presenting the retrieved pages to the access device in a format that is compatible with the at least one I/O modality of the access device by converting the retrieved page, if necessary. Indeed, Jamtgaard merely discloses a content delivery system wherein a user directly and independently accesses a web site (not via a portal) and wherein the web site accesses a translation server (12) only if the requesting device is not compatible with the format of the content pages supported by the accessed web site (see, e.g., Col. 7, lines 12-30). Accordingly, the translation server (12) acts as a proxy server for an Internet content provider to translate content pages if needed, but the translation server (12) clearly does not function as a portal site.

Thus, as demonstrated above, none of the references, singularly, discloses or suggests a “conversational portal” system or method as recited in claims 1, 23 or 34. Further, the

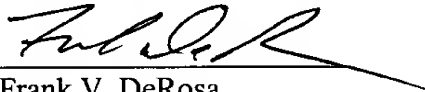
combination of such references does not disclose or suggest a conversational portal system or method as claimed, since there is no motivation for combining such references. Indeed, as explained above, Huna is utterly irrelevant to the claimed inventions. Further, other than through impermissible hindsight reasoning, no legally sufficient motivation has been provided for combining the teachings of Saylor (i.e., a mono-modal Voice Portal system) with the teachings of Jamtgaard (translating content pages to different formats) to derive the claimed conversational portal systems and methods as recited in claims 1, 23 and 34. Indeed, the Saylor mono-modal, voice-based access system is for the sole purpose of accessing content via a voice interface using a standard telephone over a landline, for example, to overcome the “major problems” associated with the World Wide Web, which requires use of a computer and web-browser to access content (see, Col. 1, lines 34-36). There is no teaching or suggestion in Saylor for a multi-modal (or conversational) content access system and the Saylor system is designed solely for voice access. Thus, there is no suggestion to combine the teachings of Saylor and Jamtgaard.

Furthermore, claims 1 and 23 are non-obvious over the cited combination of references because Saylor, Huna and Jamtgaard, do not disclose or suggest, either singularly or in combination, a conversational portal comprising a conversational browser for enabling multi-modal dialog or fetching content pages, such as recited in claims 1 and/or 23. Indeed, Saylor discloses a voice portal comprising a voice-browser. Those of ordinary skill in the art readily understand the stark difference between a “voice browser” and a “conversational browser” as contemplated by the present invention. Indeed, a “voice browser” is capable of providing mono-modal voice/audio dialog, whereas a conversational (or multi-modal browser) according to the invention is capable of providing multi-modal dialog based on the I/O modalities of the access

device. It is respectfully submitted that Examiner's contention that a "voice browser" is the same as a "conversational browser" (see, e.g., page 5 of the Final Office Action) is simply erroneous. Further, it is clear that neither Huna nor Jamtgaard disclose or suggest a conversational browser.

Therefore, for at least the above reasons, claims 1, 23 and 34 are patentable and non-obvious over Saylor, Huna and Jamtgaard, either singularly or in any combination. Furthermore, all pending claims that depend from claims 1, 23 and 34 are believed to be patentable over the cited combination at least by virtue of their dependence from respective base claims 1, 23 and 34. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,



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